

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-I(b)

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Attorneys for Dr. Michael Engelberg

In Re:

AMERICAN CENTER FOR CIVIL JUSTICE, INC.

Debtor-in Possession.

Case No.: 18-15691 (CMG)
Chapter: 11
Judge: Christine M. Gravelle

Hearing: February __, 2019, __:00 __.m.
ORAL ARGUMENT REQUESTED

**NOTICE OF DR. MICHAEL ENGELBERG'S (I) OPPOSITION TO DEBTOR'S
MOTION TO QUASH SUBPOENAS SERVED ON CAPLIN & DRYSDALE AND
LOEB & LOEB AND (II) CROSS-MOTION TO COMPEL COMPLIANCE
WITH SUBPOENAS SERVED ON LOEB & LOEB AND CAPLIN & DRYSDALE**

PLEASE TAKE NOTICE that Dr. Michael Engelberg (Dr. Engelberg"), by and through his undersigned counsel, is filing herewith an objection to the *Motion to Quash Subpoenas Served on the Law Firms of Loeb & Loeb and Caplin & Drysdale Pursuant to Rule 45, Fed. R. Civ. Pro., and Bankruptcy Rule 9016* [Docket No. 327] filed by the American Center for Civil Justice, Inc.

(the "Debtor"), and will cross-move before the Honorable Christine M. Gravelle on February __, 2019, at __:00 __.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, for entry of an order compelling compliance with the subpoenas issued to Loeb & Loeb and Caplin & Drysdale, and for such other and further relief as is just and proper under the circumstances (the "Cross-Motion").

PLEASE TAKE FURTHER NOTICE that Dr. Engelberg will rely upon the Certification of Jeffrey E. Livingston, Esq., with exhibits attached thereto, and the Memorandum of Law filed simultaneously herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested in the Cross-Motion, if any, shall be filed and served upon all parties in interest at least four (4) days before the hearing date of the Cross-Motion, or in such other timeframe as the Court designates.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Cross-Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d) and the requested relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9016-1(f), Dr. Engelberg respectfully requests oral argument of the Cross-Motion if a timely objection is filed.

Dated: January 31, 2019

Respectfully submitted,

NORRIS McLAUGHLIN, P.A.

By: s/ Morris S. Bauer

Morris S. Bauer

--and--

LIVINGSTON HOWE LLP

By: s/ David D. Howe

David D. Howe

Jeffrey E. Livingston

Attorneys for Dr. Michael Engelberg